



Connell Foley LLP
875 Third Avenue, 21st Floor
New York, NY 10022
P 212.307.3700 F 212.262.0050

Michael Bojbasa
Of Counsel
MBojbasa@connellfoley.com

October 25, 2023

VIA ECF

Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

**Re: Lourdes Ventura v. Costco Wholesale Corporation
Docket No.: 23-CV-06446(SHS)**

Dear Judge Stein:

We represent the defendant Costco Wholesale Corporation (“Costco”) in the referenced matter and write here on behalf of both parties to request an adjournment of tomorrow’s Initial Pretrial Conference scheduled for 10:30 a.m.

Plaintiff's counsel advised our office late this afternoon that Plaintiff may be agreeable to stipulating as to a cap on damages and therefore remanding this matter back to state court for further proceedings. However, counsel requires additional time to consult with her client and the parties need to enter into an appropriate stipulated order to be submitted to the Court.

The parties jointly request that tomorrow's Initial Pretrial Conference be adjourned for the reasons stated above. There have been no prior requests for an adjournment of the Initial Pretrial Conference. Lastly, the parties apologize for the lateness of this request.

Your Honor's consideration of this matter is greatly appreciated.

Respectfully submitted,

Michael Bojbasa

Michael Bojbasa

The conference is adjourned to November 16, 2023, at 2:30 p.m.

**Dated: New York, New York
October 26, 2023**

SO ORDERED:

Sidney H. Stein, U.S.D.J.

Roseland

Jersey City

Newark

New York

Cherry Hill

Philadelphia

www.connellfoley.com